

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WILLIAM HARRISON ALSTON )

Plaintiff, )

v. )

USDC No. 05-168 ERIE

Debra Forsyth, et al, )

Defendants. )

**FILED**

**OCT - 1 2007**

MOTION FOR EXTENSION OF TIME TO RESPOND TO WEST. DIST. CLERK  
GOVERNMENT'S MOTION TO DISMISS

COMES NOW the Plaintiff, William Harison Alston in propria personam sui juris acting as his own counsel, pursuant to the Rules of Civil Procedure and files this Motion for extension of the October 2, 2007 deadline. (Government's Motion to Dismiss).

In support thereof, the Plaintiff states as follows:

1.) Plaintiff hired a private investigator who has taken a deposition from a witness. The information garnered from this witness is extremely vital to the Plaintiff's response.

2.) Said deposition must be transcribed and then mailed to the Plaintiff for submission to the Court in regard to the Plaintiff's response, and along with it, in this instant matter.

3.) At the earliest, said deposition will not be in the Plaintiff's possession until Monday, October 1, 2007 and after receipt of transcribed deposition, Plaintiff must the incorporate pertinent information contained therein to the Plaintiff's response to the Government's Motion to Dismiss.

4.) The Plaintiff hired Mr. Matthew Psillas of Matthew Psillas Investigations, 1903 W. 8th Street, #175, Erie, Pennsylvania 16505, (814)864-2038.

5.) The Plaintiff received a phone call just prior to writing this Motion (at approximately 11:30 a.m. EST) from Psillas who informed the Plaintiff that he had interviewed and taken a deposition from a vital witness to this instant matter. Mr. Psillas further informed the Plaintiff, Alston, that he would begin immediately the process of having the deposition transcribed. The Court may feel free to verify this information with Mr. Psillas, if it so desires.

6.) The Plaintiff assures the Court that this request is meritorius and not frivolous and is crucial to the instant matter.

WHEREFORE, premises considered and for good cause shown, the Plaintiff moves before this Court for an Order Granting a 30 day extension of time to allow Mr. Psillas to transcribe the deposition of the witness that he has interviewed regarding this matter, for the Plaintiff to receive the information, for the Plaintiff to incorporate the information in proper legal fashion for presentation to the Court and for sufficient time to mail the information to the Court.

Respectfully submitted,

William H. Alston  
William Harrison Alston, pro se

CERTIFICATE OF SERVICE

A true copy of the enclosed Motion For Extension of Time was served upon with postage prepaid and affixed thereon and by placing same in the mailbox at the institution's department for legal mail, to the following:

Michael C. Colville  
United States Attorney  
For the Western District of Pennsylvania  
700 Grant Street  
Pittsburg, PA 15219-1961

Date: 9/28/07

*William H. Alston*

William Harrison Alston  
Reg. 07273-016  
FCC Petersburg (Low)  
P.O. Box 1000  
Petersburg, VA 23804

DEAR Clerk,

Please put this motion in front of the  
Judge at your earliest convenience as my  
deadline is October 2, 2007

Respectfully,

William H. ALSTON